

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA §  
§  
v. § CRIMINAL NO. 4:23-CR-00218-002  
§  
§  
DHIRENKUMAR VISHNUBHAI §  
PATEL §

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
OBJECTIONS TO PSIR AND CONTINUE SENTENCING**

DHIRENKUMAR VISHNUBHAI PATEL, by and through his attorney SARA RICHEY, files this Motion for Extension of Time to File Objections to the Pre-Sentence Investigation Report (“PSIR”) and Continue Sentencing and would show the Honorable Court as follows:

I.

Mr. Patel has pleaded guilty in this case and is currently set for sentencing on June 24, 2024. Objections to the PSIR are due on May 31, 2024.

II.

A derecho storm came through on May 16, 2024, knocking out power lines and causing extensive damage to homes and businesses across the Houston area. Defense counsel for Mr. Patel did not have power for several days, causing a delay to access and review the final PSIR and begin drafting objections.

To provide effective assistance of counsel, Defense requests an additional thirty (30) days to prepare and file objections to the PSIR, which would move other affected deadlines, and continue sentencing. Thus, objections to the PSIR would be due on June 30, 2024; however, given that this date falls on a Sunday, the objections would be due on Monday, July 1, 2024, the next business day.

III.

This motion is made in the interests of justice and not for the purposes of delay.

IV.

Wherefore, premises considered, Defendant Dhirenkumar Vishnubhai Patel respectfully requests a thirty (30) day extension of the deadline to file objections to the PSIR, setting the new deadline to July 1, 2024, and continue other affected deadlines and sentencing accordingly until late July and early August 2024.

DATED: May 29, 2024

Respectfully submitted,

BY: /s/ Sara Richey  
SARA RICHEY  
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Houston, Texas 77079  
Tel: 713.636.9931  
Attorney for Defendant  
DHIRENKUMAR VISHNUBHAI PATEL

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Unopposed Motion for Extension of Time to File Objections to PSIR and Continue Sentencing was delivered to all parties via electronic filing with the federal CM/ECF system.

/s/ Sara Richey  
SARA RICHEY

**CERTIFICATE OF CONFERENCE**

I hereby certify that on May, 24, 2024, I conferred with Stephanie Bauman, the Assistant United States Attorney, regarding this motion via email, and she is unopposed.

*/s/ Sara Richey*  
SARA RICHEY